

REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed December 5, 2006.

Applicant respectfully submits a Request for Continued Examination under 37 C.F.R. § 1.114. Claims 4-77 were pending in the present application. This Amendment amends claims 4, 7, 15, 21, 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, without canceling or adding any claims, leaving pending in the application claims 4-77. Reconsideration of the rejected claims is respectfully requested.

Claims 4, 37 were objected to because neither claim was clearly describing patentable subject matter as previously drafted. Claims 4-6, 15-32, and 37 were rejected under 35 USC 101 as not being directed to statutory subject matter. Claims 4-27 and 29-77 were rejected under 35 U.S.C. 102(e) as being anticipated by Beauchamp (U.S. Patent No. 6,621,505). Claim 28 was rejected under 35 U.S.C. 103(a) as being unpatentable over Beauchamp and further in view of Helgeson (U.S. Patent No. 6,643,652).

Further, claims 5, 7, 21, 60, 65, and 71 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 4, 44, 66, 72, and 81 of co-pending Application No. 10,041,015 in view of Beauchamp.

Claim Objections Informalities

Claims 4 and 37 are objected to because of language informalities. The language phrased as "user-modifiable personalization data allowing the users to each modify the functionality of elements" allegedly appears inappropriate use in light of the teaching from the Specification. It is the tool, it is alleged, the interface underlying code that allows the modifying, not the data, which is subjected to changes in the course of such modifying processes and consistent with the teaching from Applicant's specification (see Applicants Specification pg.7, lines 6-16 and pg. 13, lines 1-9).

Even though we do not agree, Applicant thanks the examiner for making these helpful suggestions. Applicant has amended claims 4 and 37 to more clearly recite language directed to the personalization interface tool underlying computer implemented code to allow modification.

Amended claims 4 and 37 have been reworded to more clearly address this issue. Support for these clarifications are found on page 21, lines 18-19 of Applicant's Specification. With respect to objections to informalities, amended claims 4 and 37 should be in condition for allowance and Applicant therefore respectfully requests that these objections be withdrawn.

Claim Rejections under 35 USC § 101

Claims 4-6, 15-32, and 37 are rejected under 35 USC 101 because the claimed invention is allegedly directed to non-statutory subject matter. The claimed elements in each of the above referenced claims recite language reciting "operable to perform or allow" another element. It is alleged that this language in the above referenced claims "does not make it clear that they are stored program instructions within tangible embodiments and were thereby actually being executed by a tangible machine to provide actual data transformation." Further, it is alleged that "the repository of record in claim 4 did not make it clear that such a database entity was implemented with a corresponding hardware medium to support persistence of software data."

However, Applicants' amended claim 4 recites an Internet application system that includes a user interface generator (operable to generate a user interface) and a web application server (operable to deliver the user interface to a client device) implemented by a computer system having processor readable storage devices and processor readable code embedded therein for executing instructions on the computer system. Components for generating and transmitting a user interface to a client to be displayed to a user, allowing a user to interact with an application utilizing a computer system, generate a useful, tangible, and concrete computer implemented result and do not constitute an abstract idea. Likewise, components allowing a user to alter functionality of elements displayed in a user interface do not constitute an abstract idea, and produce a useful, concrete, and tangible result having methods implemented by processor readable storage devices and processor readable code embedded therein for executing instructions on a computer system. Support for these clarifications are found on page 21, lines 18-19 of Applicant's Specification. Applicant has made applicable claim amendments to address the examiner's concerns reciting the corresponding hardware to implement instructions to a processor to clarify Applicant's claims. Applicant therefore requests that the 35 USC § 101

rejection of Claims 4-6, 15-32, and 37 be withdrawn in light of Applicant's amendments and no new matter added. Applicant further requests that these claims be allowed in light of these amendments and the following remarks.

Provisional Double Patenting Rejection

Claims 5, 7, 21, 60, 65 and 71 are *provisionally* rejected under the judicially created doctrine of double patenting as being obvious over claims 4, 44, 66, 72, and 81 of co-pending Application No. 10/041,015 in view of Beauchamp. (U.S. Pat. No. 6,621,505). Applicants respectfully submit that the claims as amended recite the ability of a user to modify the functionality of at least one user interface element in an application user interface. Further, according to applicant's amended claim language, a user may generate a plurality of customized interfaces to personalize user interaction by modifying a wide variety of design elements, unlike Beauchamp, where a user may only select from a plurality of standardized user-interface screens. (see col. 4, lines 24-30). Although a Beauchamp user may select from a plurality of screens, the pre-defined user interfaces are linked together in 'predetermined order to implement any activity that is appropriate.' However, in applicant's personalization system, a user has much greater freedom to design a customizable interaction model associated with metadata and utilizing a user interface generator tool. As a result, Beauchamp does not disclose a user interface generator tool nor is one anticipated in its subject matter.

According to applicant's amended claim language, a user may generate a plurality of customized interfaces to personalize user interaction, unlike Beauchamp, where a user may only select from a plurality of standardized user-interface screens. (see col. 4, lines 24-30). Although a user may select from a plurality of screens, the pre-defined user interfaces are linked together in 'predetermined order to implement any activity that is appropriate.' However, in applicant's personalization system, a user has much greater freedom to design a customizable interaction model associated with metadata and utilizing a user interface generator tool. As a result, Beauchamp does not disclose a user interface generator tool nor is one anticipated in its subject matter. Such limitations are not disclosed or suggested by Beauchamp, as discussed below, and should be sufficiently distinct from the claims of Application No. 10/041,015 in their current

form. Applicants therefore respectfully request that the rejection with respect to claims 5, 7, 21, 60, 65 and 71 be withdrawn.

Claim Rejections under 35 USC § 102

Claims 4-27, 29-77 were rejected under 35 U.S.C. 102(e) as being anticipated by Beauchamp (U.S. Patent No. 6,621,505). It is alleged that Beauchamp discloses a customizable application system operable to support an Internet application, the Internet application associated with metadata, configured for generating a plurality of application user interfaces each having a customizable interaction model, the Internet application system including: a user interface generator operable to generate the application user interface, a web application server operable to deliver the application user interface to a client, a personalization system including a personalization engine operable to allow users to modify personalization data characterizing the customizable interaction model for the user, and a data repository including a data record for storing the personalization data, the data record being accessible using the metadata. We respectfully traverse.

With regard to Claim 4, it is alleged that reusable screens being presented and customized by a user to accommodate a particular process based on metadata for rendering such screen as found in Beauchamp reads on applicant's "modifying functionality of a customizable interface or model elements being presented" because each interface elements have intrinsic functionality relative to the customizable model and that further Beauchamp anticipates applicant's ability to allow users to modify personalization data characterizing the interaction model. We respectfully traverse the 102(e) rejection of applicant's claim 4 for at least the following reasons.

According to applicant's amended claim language, a user may generate a plurality of customized interfaces to personalize user interaction, unlike Beauchamp, where a user may only select from a plurality of standardized user-interface screens. (see col. 4, lines 24-30). Although a user may select from a plurality of screens, the pre-defined user interfaces are linked together in 'predetermined order to implement any activity that is appropriate.' However, in applicant's personalization system, a user has much greater freedom to design a customizable interaction

model associated with metadata and utilizing a user interface generator tool. As a result, Beauchamp does not disclose a user interface generator tool nor is one anticipated in its subject matter.

Further, the Office Action alleges that reusable screens being presented and customized by user to accommodate a particular process based on metadata for rendering such screen **reads on** modifying functionality of a customizable interface or model elements being presented because each interface elements have intrinsic functionality relative to the customizable model. However, Beauchamp nowhere recites the ability to allow a user to design a completely customizable interaction model associated with metadata and utilizing a user interface generator tool. A user of Beauchamp would be limited to a predetermined list of standardized screens under a predefined process. (see col. 4, lines 24-30, col. 5, lines 60-66, and col. 9, lines 2-4). However, applicant's user interface generator tool and personalization system, unlike Beauchamp, provides a user with greater levels of flexibility and functionality than a canned list of standardized screens utilizing predefined processes. It is precisely this additional level of flexibility that sophisticated enterprise users need in a customizable interface. In the enterprise environment, operations beyond basic point and click navigation, retrieval of further content using a URL, and then populating standardized screens using predefined processes, is needed. Applicant's user interface generator tool and personalization system, unlike Beauchamp, provides such benefits.

Further, systems such as Beauchamp, rely on browser or browser compatible thin-client predefined elements on a user interface such as buttons, links, fields, forms, graphics, text, and other distinct parts of a user interface or associated web page (see col. 10, lines 30-32, col. 10, line 46, col. 10, line 66, col. 11, line 5). However, applicant's personalization system and customization user interface generator tool allow a user to customize the elements themselves and to therefore customize the underlying functionality and resulting interaction model between the user and any underlying applications. Nowhere does Beauchamp recite any of these features. To the contrary, the Beauchamp disclosure is directed to a series of screen layout designs using predefined processes and standardized screens to create a universal client. (see col. 9, lines 25-27 and col. 11, lines 45-47). Although Beauchamp does contemplate the use of its universal

client in an enterprise environment, the system falls short in its ability to give users complete personalization and customization as found in applicant's claim 4.

Therefore, Beauchamp does not recite the limitations of the amended claim 4 and also fails to solve the problem of providing a user complete flexibility to personalize and customize the user interaction through a completely customized user interface. Nor does Beauchamp provide a user interface generator tool where a user can build a personalized user interface. The amended claim 4 therefore distinguishes over Beauchamp.

With regard to Claim 5, it is alleged in the Office Action that Beauchamp discloses the functionality wherein members of the plurality of application user interfaces include separately configurable interaction models. With regard to Claim 6, it is alleged that Beauchamp discloses that timing of communications between the client and the web application server is responsive to the interaction model. We respectfully traverse the 102(e) rejection of applicant's claims 5-6 for at least the following reasons.

With regard to claims 5-6, since they are dependent claims directly or indirectly depending from the amended claim 4, they should be considered allowable over Beauchamp because amended claim 4 is allowable over Beauchamp.

With regard to claim 7, it is alleged that Beauchamp discloses a system embodied in a computer-readable medium for developing an Internet application including an application user interface including an integrated development environment configured for a developer to specify a user interface element in the Internet application user interface and a customizable interaction model to determine timing of communication between a client displaying the application user interface and a server supporting the Internet application. We respectfully traverse.

As discussed above, Beauchamp relies on browser or browser compatible thin-client predefined elements on a user interface such as buttons, links, fields, forms, graphics, text, and other distinct parts of a user interface or associated web page. (see col. 10, lines 30-32, col. 10, line 46, col. 10, line 66, col. 11, line 5). Although a developer may specify an element on a user interface within the framework of the universal client, such an element must also be selected from a predefined list of standardized screens and elements because the system depends on predefined elements found in browser or browser compatible thin-client architecture. In

Beauchamp, the overarching architecture of the application development depends on the universal client layer utilizing universal, common elements limited to a browser methodology for Internet web applications and for traditional client server applications limited to additional installed or built-in client side code. (see col. 23-24, lines 49-64 and col. 22, lines 46-49, lines 54-57). For many enterprise applications such limitations are no problem but in sophisticated enterprise applications, such dependence on the client side code and interfaces fall short from a completely customizable and personalized interface capability desired across the entire enterprise.

Applicant's personalization system and customization user interface generator tool allows a developer to customize the elements and to therefore customize the underlying functionality and resulting interaction model between the user and any underlying applications across the entire enterprise. Nowhere does Beauchamp recite any of these features. To the contrary, the Beauchamp disclosure is directed to a thin client universal client application utilizing browser methodology. Although Beauchamp does contemplate the use of its universal client in an enterprise environment, the system falls short in its ability to give users complete personalization and customization as found in applicant's amended claim 7. The ability to customize an Internet based application, such as Beauchamp, across an entire enterprise environment is severely limited. Although Beauchamp does provide a developer to allow a user to tag a record utilizing XML and make such a record available, nowhere does Beauchamp disclose the ability to characterize the user-modified functionality of the user customizable interaction model as found in applicant's amended claim 7.

However, applicant's amended claim 7 is directed to an integrated development environment configured for a developer to specify a customizable user interface, an application designer configured to produce metadata to characterize the user customizable interaction model, a data repository including a user modifiable data record configured to characterize the user-modified functionality of the user customizable interaction model being accessible using the metadata, and a system embodied in at least one computer readable medium.

Therefore, Beauchamp does not recite the limitations of applicant's amended claim 7 and also fails to solve the problem of providing a developer complete flexibility to personalize and

customize the user interaction through a completely customized user interface across the entire enterprise. Nor does Beauchamp provide a developer the ability to determine the timing of such a customizable user interaction. The amended claim 7 therefore distinguishes over Beauchamp.

With regard to Claims 8-14, it is alleged that Beauchamp discloses the corresponding limitations found in the respective applicant claims. We respectfully traverse the 102(e) rejection of applicant's claims 8-14 since they are dependent claims directly or indirectly depending from the amended claim 7. Claims 8-14 should be considered allowable over Beauchamp because amended claim 7 is allowable over Beauchamp.

With regard to claim 15, it is alleged that Beauchamp discloses applicant's customizable application system. For at least the foregoing reasons and in light of applicant's amended claim 15, applicant respectfully traverses the 102(e) rejection here as well. Each interface element, such as screens, it is alleged, has intrinsic functionality relative to the model being customized. Therefore, according to the reasoning in the Office Action, the intrinsic functionality of the elements allows them to be completely customized, personalized and made available to the enterprise. However, nowhere does Beauchamp recite such capabilities. For example, Fig. 2 of the cited reference refers to the universal client methodology. Further, the Beauchamp summary overviews a process of using predefined standardized user-interface screens to customize the generic screen interfaces according to XML data-tagging. In total, Beauchamp, unlike applicant's solution, is directed to a universal thin client browser oriented solution. The limitations of thin client implementations have long prevented the development of true Internet enterprise applications. Applicant's amended claim 15, on the other hand, is directed to solving these and other problems. Applicant, therefore, respectfully requests that the 102(e) rejection of claim 15 be withdrawn.

With regard to claims 17-20, since they are dependent claims directly or indirectly depending from the amended claim 15, they should be considered allowable over Beauchamp also because the amended claim 15 is allowable over Beauchamp.

With regard to claim 21, it is alleged that Beauchamp discloses applicant's customizable Internet application system. For the foregoing reasons and in light of applicant's amended claim 21, applicant respectfully traverses. The user customizable interaction model, it is alleged, is

disclosed in Beauchamp. According to the reasoning of the office, Beauchamp teaches a predefined process wherein activity is customized by a user one at a time. Once more the office further argues that the intrinsic functionality of the elements allows them to be completely customized, personalized and made available to the enterprise.

However, Beauchamp does not recite a user interface generator configured to generate an application user interface capable of modifying functionality of at least one user interface element in the application user interface as recited in applicant's amended claim 21. To the contrary, Beauchamp is directed to a thin client browser oriented application wherein a user may select from a predefined list of standardized interface screens customizable only within the screens of standard defined browser elements such as buttons, links, fields, forms, graphics, text, and other distinct parts of a user interface or associated web page. Applicant's amended claim 21, on the other hand, recites a user interface generator capable of allowing each user of the application user interface to modify functionality of at least one user interface element in the application user interface and accessible through the generated application user interface to a data storage enterprise wide computer system.

Therefore, Beauchamp does not recite the limitations of the amended claim 21 and also fails to solve the problem of providing a user complete flexibility to personalize and customize the user interaction model through a completely customized user interface and to modify functionality of at least one user interface element in the application user interface across an entire enterprise wide computer network. The amended claim 21 therefore distinguishes over Beauchamp and applicant respectfully requests its allowance.

With regard to claims 22-28, since they are dependent claims directly or indirectly depending from the amended claim 21, they should be considered allowable over Beauchamp also because the amended claim 21 is allowable over Beauchamp.

With regard to claim 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, it is alleged that Beauchamp discloses applicant's customizable Internet application system and related computer implemented methods. For the foregoing reasons and in light of applicant's amended claims 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, applicant respectfully traverses. The user customizable interaction model, computer implemented method of developing an

application user interface, computer implemented method of generating an application user interface, computer implemented method of developing an HTML based application user interface including a user customizable interaction model, computer implemented method of customizing an interaction model in an HTML based application user interface, computer implemented method of customizing an interaction model in an application user interface, and further related computer implemented methods, it is alleged, are disclosed in Beauchamp. According to the reasoning of the office, Beauchamp teaches a predefined process wherein activity is customized by a user one at a time and thus customizable. Further, the office argues that the intrinsic functionality of the elements allows computer implemented methods such that the elements may be completely customized, personalized and made available to the enterprise.

However, Beauchamp does not recite the limitations or computer implemented methods as recited in applicant's amended claims 29, 33, 37, 38, 41, 49, 55, 60, 65, 71, 75, 76, and 77. To the contrary, Beauchamp is directed to a thin client browser oriented application wherein a user may select from a predefined list of standardized interface screens customizable only within the screens of standard defined browser elements such as buttons, links, fields, forms, graphics, text, and other distinct parts of a user interface or associated web page and related computer implemented methods. Beauchamp discloses the use of a set of predefined, standardized user-interface screens to allow an entity to implement various business processes in a way that is familiar to a user (col. 4, lines 13-46). Using the standardized screens also provides for shorter and less expensive development and maintenance of business processes (col. 4, lines 39-41), and requires less training for users (col. 4, lines 42-43). A process designer can select the screens and tools appropriate for any process to be accessed by various users, whereby a subset of the standardized screens can be used as appropriate (col. 16, lines 15-56). Beauchamp does disclose some level of *non-functional* user preference setting, such as setting the language or color of the interface as displayed to a user (col. 12, lines 33-36). Beauchamp does not, however, disclose a personalization system or a customizable interaction model for a user interface element. Further, Beauchamp does not disclose allowing a *user* to modify the *functionality* of any elements of a user interface. The process designer can select various screens and tools to be displayed to a

user, but the user of Beauchamp is not disclosed or suggested to have any ability to control or modify any functionality of any element in a user interface.

Applicant's amended claims 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, on the other hand, recites functionality and computer implemented methods that are accessible through the generated customized, personalized application user interface to a data storage enterprise wide computer system. Further, applicant's additional functionality, including tools to allow a user to modify functionality of the user interface element, allowing a user to modify functionality of at least one user interface element in the application user interface, a personalization system configured to allow a user to access a user-modifiable personalization interface tool, and access such tools via a data repository across an entire enterprise wide computer system, are nowhere found in Beauchamp. To the contrary, Beauchamp is fundamentally unable to provide these and other features because it depends on a thin client universal client server architecture utilizing predefined processes in a plurality of standardized screens modifiable by a user, developer or administrator only within a browser methodology limited to common Internet browser functions. However, modern sophisticated enterprise computer system users require much more advanced functionality and flexibility than merely populating data via XML tags into canned reports resident on standardized screens utilizing predefined workflow processes. Although, the universal client architecture allows a developer or administrator the ability to define its own workflows, they must do so within the restricted confines of the Internet browser limited set of elements that includes button, links, fields, forms, graphics, text, and other distinct parts of a common Internet web based user interface.

Therefore, Beauchamp does not recite the limitations of the amended claims 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, and also fails to solve the problem of providing a user complete flexibility to personalize and customize the user interaction model through a completely customized user interface and to modify functionality of at least one user interface element in the application user interface across an entire enterprise wide computer network. The amended claims cited above therefore distinguish over Beauchamp and applicant respectfully requests their allowance.

With regard to claims 30-32, 34-36, 39-40, 42-44, 46-48, 50-54, 56-59, 61-64, 66-70, 72-74, since they are dependent claims directly or indirectly depending from the amended claims 29, 33, 37, 38, 41, 45, 49, 55, 60, 65, 71, 75, 76, and 77, they should be considered allowable over Beauchamp also because the amended claims recited directly above are allowable.

Claim Rejections under §103

Claim 28 is rejected under 35 U.S.C. § 103(a) as being obvious over Beauchamp in view of Helgeson (US 6,643,652). Applicant respectfully submits that a proper prima facie case of obviousness has not been established and further that these references do not teach or suggest each element of claim 28.

First, Applicant contends that the Examiner has not been able to establish a prima facie case of obviousness in accordance with 35 U.S.C. 103(a) and MPEP 2143. Specifically, there must be some "suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to combine reference teachings with a reasonable expectation of success." The Examiner argues that although Beauchamp does not disclose a client wireless system, but at the time the invention was made, the use of browser markup language as a carrier of specification data, such as XML, has been used to communicate with devices in all type of networks wherein wireless protocol for wireless portable or embedded processing units was a known and evolving methodology. In a method to extend the browser functionality similar to Beauchamp creating browser metadata, Helgeson discloses, it is alleged, a client machine being a wireless device. Hence, the Office argues, it would have been obvious for one of ordinary skill in the art at the time the invention was made to merely include in the client system of Beauchamp wireless devices taught by Helgeson because rendering a client interface environment environment using metadata specified via a carrier like XML metadata would enable those wireless system to obtain support from service providers without a sustained link with such service, and thus by means of wireless protocol as taught above XML-formatted specification would provide resource efficient support for dynamic as needed basis application specification in order to render browser functionality as purported by Beauchamp, in view of the known concept that wireless devices entail restricted storage resources.

Nonetheless, the argument of the office must fail because the recited combination would not even yield a system with functionality as claimed by applicant. However, this argument is secondary since no *prima facie* case has been established by the office.

None of the cited references, alone, teach an enterprise wide accessible personalization user interface that gives a developer or a user the ability to completely customize the functionality of the user interface element via a enterprise accessible data repository. Applicant's claim 28 is directed to unique system architecture to provide advanced customization and user control within an HTML environment including features such as page element functionality, alternative functionality, arrangement, and visibility. Further, the customization includes both configuration and personalization applicable to multiple users, consistent users, privileged users, and supervisor. The user profile and configuration information is stored at a location physically remote from client-side access systems, such as client web browsers thereby avoiding substantial client side processing, unlike the alleged combination cited by the Office. Further, applicant's claimed invention provides methods, tools and systems to allow a user to control data input and output, presentation of requested information, logical operations, or characteristics of communication between the browser compatible interface and disparate servers.

Further, Beauchamp and Helgeson in combination do not provide the requisite "reasonable expectation of success" in accordance with MPEP 2143 since the cited system developed in the combination proposed by the office would not provide the claimed subject matter of applicant. Moreover, nothing within the disclosure of either Beauchamp nor Helgeson suggest combining such systems to solve the problems identified by applicant. However, support for the aforementioned application and its subsequent reduction to practice is provided

inter alia on Pages 4-17 of the applicant's specification. When the combination of the references lacks the requisite motivation to combine, a rejection based on a *prima facie* case of obviousness is improper. In re Rouffet, 149 F.3d 1350, 1357, 47 USPQ2d 1453, 1457-58 (Fed. Cir. 1998). On this basis, applicant respectfully requests that this rejection, based on 103(a), be withdrawn.

Further, In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988), stands for the proposition that there is no motivation to merely substitute a particular component into a system of the primary reference to make a *prima facie* obviousness rejection. There, the claims were directed to a system for detecting and measuring minute quantities on nitrogen compounds comprising a gas chromatograph, a converter which converts nitrogen compounds into nitric oxide by combustion, and a nitric oxide detector. The court found that there was no support or explanation to merely substitute one type of detector for another in the system of the primary reference. Likewise, here, no such motivation or support exists to merely substitute Helgeson wireless connectivity into the Beauchamp process to deliver personalized user interfaces and client server interaction in an Internet application across disparate platforms in an enterprise wide computer system.

In spite of lack of a *prima facie* case, applicant further respectfully submits that the alleged obviousness case for the rejection of Claim 28 under 35 U.S.C. §103(a) over Beauchamp in view of Helgeson (US 6,643,652) must also fail. Claim 28 depends from claim 21, which is not rendered obvious by Beauchamp as discussed above. Moreover, Helgeson does not make up for the deficiencies in Beauchamp with respect to these claims. Helgeson is cited as teaching a client machine being a wireless device (OA p. 24). Helgeson teaches mapping between a generic interchange format and local formats that are device specific (such as to cell phone 411), whereby disparate business systems can be distributed across multiple hardware platforms and take advantage of native APIs (col. 1, lines 34-40; col. 2, lines 49-67).

Helgeson does not, however, teach or suggest a customizable interaction model for a user interface element or allowing a user to modify the functionality of any elements of a user interface via accessing a data repository across an enterprise wide computer system utilizing other architectures than a common Internet web browser or client server. Also, Beauchamp in view of Helgeson, in combination, do not teach a user interface capable of customizing elements

such as logic, data processing, responsiveness to user input, checking data entered into a form field to have an acceptable format, syntactic processing, and hotkey responsiveness. The aforementioned element lists are merely exemplary of a plurality of elements available for customization and personalization in applicant's claimed subject matter. Moreover, Beauchamp in view of Helgeson actually teach away from such functionality because the combination depends on XML tags implemented in thin client web based browser client interfaces limited to a predetermined number of user modifiable elements corresponding to common web browser functionality. Applicant's claimed subject matter, on the other hand, allows for the inclusion of displaying error messages, modifying the order of element, controlling when data is passed from a client to business logic processes performed on a server, or focus controlling the time before such data is transferred. None of these features are taught in Beauchamp in view of Helgeson because it depends on a common web based browser interface with traditional design elements.

As such, Helgeson cannot render obvious Applicants' claim 21, or dependent claim 28, either alone or in combination with Beauchamp. Applicants therefore respectfully request that the rejection with respect to claim 28 be withdrawn.

Claim 28 depends from claim 21, which is not rendered obvious by Beauchamp as discussed above. Moreover, Helgeson does not make up for the deficiencies in Beauchamp with respect to these claims. Helgeson is cited as teaching a client machine being a wireless device (OA p. 24). Helgeson teaches mapping between a generic interchange format and local formats that are device specific (such as to cell phone 411), whereby disparate business systems can be distributed across multiple hardware platforms and take advantage of native APIs (col. 1, lines 34-40; col. 2, lines 49-67). Helgeson does not, however, teach or suggest a customizable interaction model for a user interface element or allowing a user to modify the functionality of any elements of a user interface. As such, Helgeson cannot render obvious Applicants' claim 21, or dependent claim 28, either alone or in combination with Beauchamp. Applicants therefore respectfully request that the obviousness rejection with respect to claim 28 be withdrawn.

Beauchamp discloses the use of a set of predefined, standardized user-interface screens to allow an entity to implement various business processes in a way that is familiar to a user (col. 4, lines 13-46). Using the standardized screens also provides for shorter and less expensive

development and maintenance of business processes (col. 4, lines 39-41), and requires less training for users (col. 4, lines 42-43). A process designer can select the screens and tools appropriate for any process to be accessed by various users, whereby a subset of the standardized screens can be used as appropriate (col. 16, lines 15-56). Beauchamp does disclose some level of *non-functional* user preference setting, such as setting the language or color of the interface as displayed to a user (col. 12, lines 33-36). Beauchamp does not, however, disclose a personalization system or a customizable interaction model for a user interface element. Further, Beauchamp does not disclose allowing a *user* to modify the *functionality* of any elements of a user interface. The process designer can select various screens and tools to be displayed to a user, but the user of Beauchamp is not disclosed or suggested to have any ability to control or modify any functionality of any element in a user interface. As such, Beauchamp cannot anticipate or render obvious Applicants' claim 4, or the claims that depend therefrom. The other pending claims as amended recite limitations that similarly are not disclosed or suggested by Beauchamp, for reasons including those discussed above, such that those claims also cannot be anticipated or rendered obvious. Applicants therefore respectfully request that the rejections with respect to claims 4-27 and 29-77 be withdrawn.

Amendment to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,



K Brian Matlock
Reg. No. 52,005

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 415-576-0200
Fax: 415-576-0300
KBM/jkh
61011250 v1